

Waymo v. Uber
Case No. 3:17-cv-00939-WHA

TRIAL EXHIBIT 8855

Uber Objections:

- Fed. R. Evid. 802 – This document contains inadmissible hearsay; namely, out of court statements made by Anthony Levandowski, who participated in the Stroz diligence process in his individual capacity. *See* Br. § II.
- Fed. R. Evid. 805 – This document contains inadmissible hearsay within hearsay; namely, Anthony Levandowski’s recitation of out of court statements made by other declarants. *See* Br. § II.
- Fed. R. Evid. 403M – The original document contains multiple different colors of writing. The different colors are attributable to different authors and/or were composed separately at different points in time, which raises a risk of jury confusion. *See* Br. § II.

Note: This document contains handwriting and original highlights, and therefore is not susceptible to highlighting.



3/22/16



Interview starts at 11:10

Anthony reviewed questionnaire. — T+Conet

We review the devices. Approx. 37.

iPhone 6s. primary phone. Personal and work. Any communication including Google. Got the phone Dec 2015. Shouldn't have google email. Used google apps. Didn't sync with email... used app. Google confirmed email was disabled at departure. Ottomotto email is on the device. Gmail app. Doesn't use default mail app. What accounts do you access on the iPhone 6? Text messages, snapchat, imessage. Sync notes with gmail. Sync contacts with carddav. These should all exist in gmail. Had evernote before but not on the phone. Is phone syncing icloud? News, safari, only. Backup may be enabled.

What was the phone prior? iPhone 6 was wiped and given away.

Nexus was crushed.

Does not have any other phones.

Password protected itunes backup.

ipad mini? Didn't bring it with him. Tablets are easy to get. Used to fly his helicopter... remote. Got in 2014. Girlfriend has access to the iPad mini. Should not include any relevant data.

ipad3? Got in 2013, used for personal use. Looking at Netflix video, games, personal pictures. Not syncing email. Dropbox may be installed but not connected and synced. GF has access... doesn't use

Nexus 7? Hasn't been used. Project airplane controls. Not google related. Never synced mail. Set up dev email, set up site project how to pick up things on the ground. Testing only, no google IP. (side project funded by google, but not google related. Google exec funding it Tiramisu, now called Flyer) FilNow a startup called Kittyhawk, Tiramisu, Flyer.

Apple Laptop. Primary. Used for both work and personal. FileVault encrypted. Got it in 2013. GF has access. Uses it for everything. For work, yes used it for Google. Uses it now for Ottomotto.

Google: email, presentation, no software, no code, no dev work, used it to work on docs. VM for windows, to configure tools. Work gmail, gdocs. What type of work doc, videos, presentations, datasheets. Anything related for chauffeur? All should be in a folder? Accessed email via web. Did not sync. All documents are synced with dropbox. Still has google-related files on his laptop. Also has 3rd party documents, including vendor updates (google vendors). Presentations given while at google. What sorts of Manuals? Parts they would buy and data sheets. Public documents and internal documents. Seems privileged. Should all be contained in chauffeur. (we manually went through some files so some last updated time stamps may have been triggered). Most stuff should be in chauffeur.

Worked on streetview and maps previously. Laptop has proprietary data. There are some documents of other employees personal data confidential (management related docs) under chauffeur.

Any other google or chauffeur docs? No... He told (someone) he had some data he needed to return. Talked to Uber and one person said keep it, someone else said to get rid of the data. He asked if it was OK to delete, Uber said yes.

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United States District Court Northern District of California	
Trial Exhibit 8855	
Case No.	3:17-cv-00939-WHA
Date Entered	
By	
Deputy Clerk	

STROZ_0021120

Did you save any google work email? Not that I know of. ~~Google work email.~~

Ottomotto: uses it for work, datasheets, spreadsheets, text files, no local emails. Uses webbrowser for gmail check downloads folder. Files it online in dropbox, move a lot of stuff to google docs. Anything in Ottomotto that was copied from Google? NO. he was super careful about not copying anything over.

Filevault enabled. Have you wiped your laptop recent? No. but he may have wiped it in 2014. Reinstalled OS.

~~Brobox~~ Uses it to keep big files. Shredded all the drives. New drives not even formatted.

On to the next...

~~Desktop~~. Used as a gaming machine running windows 10. There is nothing on there. Pictures, no work email. Doesn't seem to be in scope.

~~10 Dell servers~~ in storage. Lathrup, Ca. hasn't touched the, was never google property. Contains what is now google data. Vutool, 510 systems, and Anthony's Robots.

VuTool turned into Streetview.

510 mobile mapping

Anthony's robots, wiring for robot cars.

Contained log of gps, indoor mapping tool, trials of different versions of camera and GPS mapping.

Made a list of what they wanted, these machines were part of what they didn't want.

Google took all the info and let theft these machines behind. Lets put them in storage. Google didn't instruct them to keep or destroy any of the assets so they kept them in storage. They delivered what they wanted and left behind the others.

~~20 Homebuilt machines~~ were part of the same agreement. Doesn't know whats on them. Never used for google related work. Part of the assets Google didn't want. Not attached to these. Doesn't know how many or whats on them. May not even know where they are. Haven't accessed anything since 2010 or 2011. Employee workstations. Bought 510 later. Bought vutool in 2007??

~~10 email accounts~~. (gmail may have dual authentication). Anthony is going to disable 2 factor so we can pull down his accounts.

Cant disable it on his phone so he gives us authorization to use "authenticator" on his phone to access his gmail account.

Lists many devices to access emails in the past. He doesn't have possession of the items anymore. If its not listed, he doesn't own it anymore.

~~10 email accounts~~.

Bulk of accounts are personal. Did you ever send yourself emails from google? Some but not many. He was careful about that. There are emails from work to personal, but most are likely tax or personal in

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STROZ_0021121

nature. A few files he needed to print, but not substantial. We should search from

@google.com.

@mac account is not used much.

@US, election stuff

UCISRobot (promotional stuff) discount for printed circuit boards

Others were created for dating sites,

Otto is otto related.

External email accounts. Outside of google and otto gps on bulldozers.

Google encourages outside projects.

Work accounts

Set up 2016 otto o March 1 2016. Should not contain anything prior to 2016 (nothing interesting)

Uses them now (otto) for work

Hard end date January 24ish. (January 15-Feb1).

Domain may have been established prior to Jan 24th, but email was setup after. When was the Admin created on the Otto accounts?

April 9, 2007 (started at Google). Through the Vutool acq. Sebastian Thrun, Andrew Lookingbill, Joakim Arfvidsson, Hendrik Dahlkamp, (founders of Vutool) joined Google to start streetview.

Signed invention, employment, etc agreement. All received separate contracts.

What do the contracts obligate you to? Not to approach employees, and to keep their secrets a secret. He shouldn't tell others about their secrets.

Any special policies? Several levels of non solicit, there are people who cant solicit for a year or encourage to leave.

Any other obligations? Not solicit or disclose? Training courses, political, user privacy, etc. No training on non solicit or confidentiality. There was training on queries and user data, but nothing on IP related.

Took great care in user data.

What info did you have access to about other employees. Managed 25 people, he had access to salary bonus, etc. home address, work evals, performance rating scores, coach them for promotions, etc. only the 25 he managed. He didn't have HR access. Only has some data on Laptop.

Anthony is writing down the list of 25+ employees. Exhibit 5.

He went through his records to see what employees he used to work with or knew (to create the long exhausted list.

Google

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STROZ_0021122

Side work: what is googles policy? Anything you did not related to google work, it was yours. Google doesn't care unless its directly related. ✓

Side projects while at Google? →

Main work: started in 2007-2008 Streetview.. roll out vehicles world wide,

2008-2009 airplane view aero imagery. (GEOS)

2008- started mapping. Setting up operations in Mountainview and India, extract cities of stop signs, streetnames (GT, Ground Truth). This is all confidential. Requested to do a TV show to deliver pizza, started a company approved by Google. Started Anthony's Robots (external non google company) 2008-2009. Never used funds from Google. Prototype this (tv show). Discovery channel.

→ Finished US Maps, started google Chauffeur in 2009. Hardware done by Anthony's Robots, software at Google. Sold 2011 to Google. S10 systems also brought into Google. Wasn't involved in S10, just used their equipment (but he was an investor). Started to invest in S10 in 2005. Darpa Grandchallenge (robot competition), farming navigation for Tractors, Topcon then used for motorcycles, then tractors.

Google was aware of all side projects. Manager was a mentor. No secrets? No policy really as long as its not competing.

Positions at Google: years.

2007 Software Engineer to 2011. ✓

2011-2012 Engineering manager but acted as product manager ✓

2012-2016 Engineering Manager ✓

Get shit done rolls. 2007-2011, find out what needs to be done, do it, move on.

Wrote a bill to pass self driving car. ✓

Never wrote any software code. Technical project manager rolls. ✓

Project names Streetview (City Block), Ground Truth, Chauffeur, GEOS. Help on various projects (carboard, tellapresence). Chauffeur (Selfdriving car). ✓

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Interview starts approximately 10:10.

Returned phone to Anthony, took possession of laptop.

Talking about the email on the laptop. Ottomotto is not synced. Gmail from Google was synced.

Do you have access to Google work mail on their server? No, no way.

The messages were synced awhile ago.

What is on the cloud repositories? Ot.o and ottomotto.com, no google drives. Dropbox (personal) has Google work stuff which hasn't been touched (likely Chauffer docs).

Do you actively use this account? Yes

Apple Laptop not synced up for email, dropbox or any drive syncing. He does access drive separately through chrome browser, log into email. Ottomotto domain registered gmail domain.

Took possession of 3 ipads

Anthony forgets his password to one of the ipads and is attempting to remember the pattern. It may disable if too many incorrect attempts are made.

Return to where we left off yesterday.

Hired in 2007 to work on streetview until 2008.

2008 and 2009 side project GEOS

2008 started to work on mapping in Mountview and India. Make the database behind maps.

2009 joined chauffer project,

Side job 2008 2009 worked on robot cars (deliver pizza).

Google saw it was possible and got excited. All of this was approved by Google.

This became Anthony's robots which was sold to Google.

510 systems predated Google. Laraison was the original name.

Sold 510 systems to Google in 2011.

Software Engineer supervisor Sebastian Thrun. 2007-2011 Chris Uhlick was his initially supervisor for a week or so.

2012 promoted, Sebastian still his boss then Chris Umson

Later 2014 Bryan Salecky was then his supervisor.

Reference handwritten list of 25 employees.

Who else did you work with? References the typed long list he previously provided. A lot of them came from 510.

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more
Devices

Sold Robot

2011 sold

a lot of
employees came
from 510
STROZ 0021124

The long list of employees is ALL employees he ever contacted during his time at Google.

How did you create the list? Went through the phone contact list. Gmail contacts.

Did you rely on internal contact list? No

Put an arrow next to those he worked with on a regular basis.

He will identify those employees he did group with projects with.

(talking to himself, may have found a mistake on the list).

(asked for the handwritten list back to make some adjustments)

What types of documents did you create while at Google? Operational manual, how to operate a street view car, how they systems fit together, lots of emails, some presentations, training information AERO imagery, internal presentation how to evaluate a product.

Where did you store these? On Google Drive.

Were you issued any devices? Yes, 2 desktops, 3 laptops, maybe 5 laptops (linux desktops) mac laptop, 2 chromebooks, 2 lenovo laptops, 1 linux, 1 windows. Blackberry. Did they have a BYOD policy? No Google has the ability to install Gmail app and they control the settings from there.

When you resigned, what did you have? 2 desk, 2 laps

What happened to the others? They were returned.

Used Lenovo and personal laptops to access gdrive.

Did you ever plug in flash or external into google desktops? Yes, everyday, they used usb to move stuff onto the car. Usb to sata adapter. Those were returned (tracked by Google).

All had asset tags

Ever use a personal usb on Google? Yes, its possible. He had tons but destroyed them. How? Took them to shredder and had them shred. Bryan knew about this.

While on streetview, they had to identify all disks that went into any streetview car (2012). Wifi sniffing.

He never destroyed Google property (assets).

They had vpn but he never used it.

Do you know what was on the usby he destroyed? Trade show stuff, vendor sheets, files he was moving around.

Any source code? No.

Someone was leaving usb drives with spyware so he wanted to make sure he didn't have any.

Why no vpn? Too much of a hassle! Easier to go to office and work.

usb drives never

Google pen Retrieved

used flash USBs drive to move stuff to server

USED flash external drive + shredder

usb drives

No VPN

Devices issued @ Google to happen also used

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When you accessed Google's network, (Hanley lists all devices that may have connected to it). Anthony confirms they all MAY have been used to access but nothing connected to corporate network,

Did you ever email yourself any Google files? Only presentations or other docs he couldn't access otherwise (should all have attachments).

Scan in doc and forward to himself.

[REDACTED]@google.com to [REDACTED]@gmail.com

Any information regarding projects sent? Don't think so.

Data sheets? No.

Nothing Technical? No not likely

There may have been a Morgan Stanley report. Robot car analytics

No proprietary data? No don't think so

Did you store Google info on any personal devices? Laptop, the phone? No usb or flash drive

He plans to tell us where he thinks "things may be"

There are 3 locations, downloads on the Mac, Dropbox, Chauffeur folder, emails that were synced.

How did it get on there? Through normal work activity.

This is his personal laptop. They have a way to let people to use their own stuff. No special documents to sign regarding their policy.

Did you store any data anywhere else online? No, not that he can recall.

Very unlikely on any other devices.

Drobo (file storage). That is where his computer was backing up to. (Drobo 1 stopped working, Drobo 3 stopped working too) he no longer has those.

Left Google Tuesday 1/26/2016 - RESIGNED

When did you first consider leaving and why? I considered it in 2008. He did the streetview thing and GT project. He stayed because it's a great place to launch new projects. In 2013 when he started to work for Chris, they don't like each other. It was difficult.

How serious in 2008 and 2012. He was talking to people (Joel on the list). The idea came about that human drivers are not good. They wanted to be the first to do it. He felt they went in the wrong direction with Chris.

After 2012 he stayed because it was still the right place to see things through. There was a chance things could turn around.

2015 rolls around and they are approaching a deadline of launching the vehicles and it's even more clear they are doing the wrong things. The design was not relevant the technology is what was wrong.

Sent
yourself
Google
Data

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STROZ_0021126

Firefly, SDC, Chauffer, "the robots".

What did Google think? Everyone believed in it, Larry Page upset with the direction, Anthony is trying to lead the direction and it kept shifting back to the original course. It was time to move on. The mentality higher up was stifling the release. (too focused on safety).

Did you and Larry discuss a start up? No

Trucks not competitive with Google at the time.

He sent Larry and email shortly before he was ready to leave. He didn't respond but sent Chris a not that he resigned and then Chris escorted him out.

There is a clear course of action to resign and he must have deviated from that.

25th sent email to Larry (its in his Gmail) 2am

Larry forwarded to Chris

He shows up on the 26th. Chris Urmsop removes Anthony's badge, escorts him to a conference room and Bryan joined the meeting and they discuss why Anthony is leaving.

They ask why he can leave, I hear you are recruiting people, (Chris was doing the talking).

Did you talk about recruiting people, he said there are people who have the same vision he does. They never asked who.

After the meeting, chris walked him to his desk, gathered his things, escorted him to a room and HR joined.

Chris and Anthony chatted about what went wrong.... Some weird conversation happened about how he could leave. Anthony asked if it was true that Chris left the group, Sergi told him chris was leaving. Chris returned to the group to stop Anthony from doing what he wound up doing. They at one point were room mates.

Anthony talked to HR (Chelsey) who calls legal person to come in.

15 minutes, what it means to leave Google. They talked about why he was leaving. She asked for his devices. All Google property was left behind.

Did they give you any instructions? No.

The chat with legal was about non solicitation and confidential info. How do I go about it when people call if interested in joining his new project. "Happy to meet with you but I cant talk to you about my work things because I have contractual agreement I intend to honor with Google". They verbally agreed to the language. They would not provide him the language. No documents to sign. It was mailed later and we now have possession of what he received. (video conference not in person).

Did she ask you questions about the documents you previously signed? No.

No additional instructions.

Legal was Jade Wagner.

None
Google

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We revisit the conversation in the conference room when Chris mentioned he heard Anthony was recruiting people. They later met with people to have one on ones to make sure they were not going to leave (hear say). Nobody else left that day.

John Craftcheck called Anthony asking what happened.

Did you return all Google property on the day you left? I returned all the computers that day.

He has some other random parts he disposed of those later. (streetview and maps). Tools, pieces of aluminum, robot parts (nonproprietary), test cameras. They were in the house in a box. He found when he was looking for stuff to make sure he didn't have of anything. He destroyed them. Crushed and melted. He paid to have them destroyed. He doesn't know their name. he didn't want to have anything left. if he gave it back, he thought it would spark unnecessary back lash.

Did you know the files were on your computer before yesterday? No.

He was advised to not delete anything to show he didn't access anything.

We discussed why self remediation was not the best method at this point.

Stuff that is on Dropbox is historical, not created on the weeks prior to leaving.

Any hard copies? No

Did you download copy or export? Not with the intention of leaving. Some stuff on the Apple laptop

R&D stuff? Yes

Technical? Yes

Customer? Yes

Software or hardware? Maybe

Employee data? Yes

Trade secrets? Yes

IP? No

Google just emailed him the rights agreement about inventions.

Any user data? No.

3rd parties? Yes.

He has this stuff because its customary to do this while at Google. He didn't remember it was there. Upon discovery the advice was not to delete.

Did you destroy anything else? Yes, the disk and some non sensitive was destroyed (the box of stuff).

The box of stuff was destroyed last week.

Did anyone tell you to destroy that stuff (from Uber?) no (they told me to destroy the disk)

Return
of
Google Property

Deletion of Google Stuff

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STROZ_0021128

check to see if heard Georg to stop
~~Georg to stop~~

Did you check all your email and storage accounts? Physical stuff, not digital media.

Did you check online stuff? No

Your at google, unhappy, when did you first hear about OttoMotto? Lior's timing was impeccable. They discussed Lior joining Chauffer. He ran a competitive project, (Map making). They spoke a couple of times. Their first meeting was on campus (august or sept 2015).

They talked about what was going on at Chauffer, Anthony tried to get him on the team.

They had a followup meeting on a Saturday or Sunday chat, They live close by and walked around the neighborhood and talked about the robot trucks. It wasn't a secret that he was unhappy.

Lior was telling him about Alphabet, the clothing technology. Alphabet is a holding co for Google. They discussed possibly having Trucks an Alphabet product.

They talked about the opportunity for Trucks in the market, aftermarket kits, etc. More like the Tesla Autopilot.

He had chats with other people regarding how to make it work at Google. The opportunity with Lior was a last option (?).

When did you start to talk about a startup? A few weeks later. 2nd outside meeting, early September.

The Google-CFO lives near by too.

Second outside meeting is when things started to solidify. They discussed waiting until they leave or lets thing this through first.

When did you talk to Larry and Chris? (wrong path conversion) Jan 2015. They discussed releasing the car, the agreed but then moved back to the original course.

It was clear to Anthony a week before he left that the path was not going in the direction that worked for him.

Every 2 weeks he met with his employees for 30 minutes to see how things are going.

How many group meetings? 3, 1 bbq, ski trip, 1pm gathering, 1 pm gathering at Anthony's house.

Matt Williams, Lior, others on team (Chauffer) Brian Cullha, Brian Tunellini (?)

When?

BBQ- whole laser team (perception) 1 software engineers December 2015 (harmless, people came over, very casual)

Ski trip- January 2016

Anthony was writing on the board about the meetings.

He had 1 on 1s and group chats

1 on 1 (forming new company date)

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not when Pierre

Discussion with Anthony regarding what they want to do. 30 minutes every 2 weeks.

Pierre (2012) (December 2015-Jan 26) did he initiate it? It was mutual about what's next. They were discussing the bonus payout. 4 year increments. If you left the company within 6 months, you got it all. They talked about lasers for drones, security. Electrical Engineer. #1 tech lead. They talked about trucks, and sort of interested, he was not interested in the kits. He was more interested if Arta, Sam, Liala were to join.

BBQ Social

Intro to Lior

Pierre, Gatean, Luke Washer, Drew Ulrich, Morriss, (side conversations at bbq)

Laser team chat with Brian Selleski

B-Bqve

All hands Tues and Thurs

After talking to Chris and Brian about Anthony's future, they address the team that Anthony is moving off the laser team. Brian leaves the room and the team chats about it.

After the bbq people talked amongst themselves, Anthony didn't recruit anyone directly.

There might be some text messages.

One on Ones

Wanted to get their thoughts on trucks vs kits, exploring ideas.

Pierre (Dec 2015) regularly

Gaetan (Dec 2015) regularly

Will McCann (Jan 15, 2016) 2 times

Drew (Dec 2015) 4 times

Bernard (not at all)

Liala Mathos (Dec 2015) regularly

Blaise Gassend (Jan 2016) 2 times

Anthony Hinton (not at all)

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Ionut Iordache (same as Will)

Ski Trip

I stepped out for a break and returned within 5 minutes (see Handley's notes for diagram of what was written on the board)

Those who solicited Anthony- Bryan

High priority (those who showed interest)

*Pierre

Gaeton

Laila

Others who they spoke to "low"

Will

Drew

Blaise

Ionut

Luke

Rahin

Sam

Don

What did you talk about regarding new co and when? All communications were verbal

*Pierre: (talked about different options, he preferred trucks, he wanted to be a founder, wanted to match Lior's stake, committed to funds, had meetings at his house. Strat was to ask Chauffer, if they didn't they would try trucks at alpha, if not they would leave. He asked to help and bring on people. He wrote up and brought offer letters for people to join NewCo. (hardware engineer)

Gaeton: (much lighter than discussions with Pierre. He requested a specific number of engineers. He wanted to invest. He want Anthony to hire his brother and others (Not Google employees) they met 3 times one on ones between Dec-Jan (mechanical Engineer)

Laila: (she approach him after talking to Pierre. They chatted, trucking vs kit, she wanted to understand maternity leave things (she was pregnant at the time). They met 3 times 1 on 1 between Dec and Jan (Manufacturing engineer) she sat close by, they talked in person.

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Mark Shand: Anthony did not encourage him to leave Google. Mark initiated communication Dec. he approached him again in Jan. Anthony wasn't very interested in him. Mark heard about it and wanted in. 1 verbal meeting at Google.

Zach: 2 meeting (1 verbal chat 1 meeting at his house) he received an offer from Anthony. Anthony said he needed a team, he knew Zach was unhappy. They spoke at Zach's house and was given an offer letter. Anthony initiated it verbally.

Will McCann: 2 discussions, 1 – 1 on 1 at Google, and 1 evening walking around (Jan 15 and 23rd). the 15th was him approaching asking what they were up to, Anthony said he was thinking of leaving and doing something in the robot car space. The evening meeting was to finalize his offer letter. Will requested the meeting. They discussed salary and offer. Will was given an offer prior to the meeting through Rhlan. The offer may have come later (he did not end up joining).

Drew: discussed general business client. Discussed new focus project at Google. Started to talk about newco in Jan. they discussed a start up earlier but nothing specific. The idea was that the team would leave google to start something. Drew received an offer. He is a mechanical Engineer. Maybe a text about setting up an evening group discussion. Sent to Google email address. Anthony encouraged him leave Google.

Ralse: Anthony did not encourage him to leave google. He approached Anthony (seemed pushy) they had 3 discussions and seemed forceful. 2 were on campus, 1 off campus (on the phone). There are phone calls and text messages regarding comp, role and needs. Jan communications.

Ionut: 1 chat in person Jan 15, 2016. Talked about where the business would be base, he approached Anthony.

Luke: same as Ionut, 2 chats both at Google, initiated by luke first then Anthony followed up. All verbal. Second meeting was discussed location for newco. General conversation about what Luke heard from others. He wanted to know more. Anthony asked him to talk to the others. 2nd meeting was a follow up. He received and signed offer letter. Which has since expired.

Rahin: Hardware Engineer. Approached by Pierre. Follow up by Luke, 3rd time met with Anthony to discuss salary. Verbal communications at Google. 2nd meeting was at google (walk). 3rd meeting was likely after work. Anthony didn't initiate any meetings. Not texts or emails. Jan 2016. Received offer, not signed. Which has expired.

Sam: Hardware Engineer. Approached by Pierre. Later asked . (I stepped out of the room to have Don sign the COC). Break for lunch.

Sam initiated conversations. They talked about more technical things. Sensors they should develop. Why are robots important? Talked about compensation. Didn't talk about his role. No text or emails

Nick: Anthony reached out to him in November. They talked about macro pictures, why trucks are important. He didn't get an offer letter. 1 in person meeting. A few text about when and where to meet. They met downtown SF. Embarc and Market. They met in January 2016.

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Don – 2 chats. Joined OttoMotto. He was always frustrated with Google. 2 in person chats about Anthony leaving and what he was going to do. Anthony initiated 1st meeting, Don initiated 2nd. Jan 4-5 or 6. 2 meetings at Google. They are friends. 2nd meeting was about general discussion about what they would be doing. Software engineer. Offer letter was given before Anthony left Google. They communicated a lot on a personal level. He joined Feb 25ish.

Anthony was clear that he wanted to do this project at Google but it didn't seem to happen so he left to do this on his own.

Brian (user experience designer) one phone conversation, 1 planned in person. Anthony walked up to his desk and said "do you want to talk" Jan 05, 2016. They talked about the direction of the internal project. They had 1 unplanned when Anthony was out with Matt and saw him at a coffee shop. Brian joined the conversation. Philz Coffee in Palo Alto. 3rd conversation was "we just got offered more money to stay, can I join you guys later?". Same deal applied to the other Brian. Pierre may have given him an offer letter.

Brian (operation –program manager) manages the human side of the car. Used to work for Matt. Anthony and Brian meet after he heard what was going on. Seemed very interested. Brian reached out to Anthony after he spoke with Matt. Walked up to Anthony's desk. Jan 2016. He got an offer. (likely)

Matt Williams. They spoke about this for a long time. They used to work on Streetview together. Dates back to Dec 2014 or Jan 2015. Nothing concrete, but thinking about it. Fast forward to Sept, he said as soon as he is paid he is going to leave. Matt encourages Anthony to leave Google. They discussed Alphabet, Matt doesn't agree that it's a good idea. He is the first of Chauffeur to leave. He left Jan 4. He will likely join when he returns from a long vacation. No discussions about role or compensation.

Rikard grunnam: mechanic. The outfits the cars. He approached Anthony, they talk about money, the plan for 2016. He didn't get an offer letter. He was going to wait for his bonus. Met in January twice. Both meetings at Google. Anthony walked up to him the second time.

Bryan Sellesky. He was upset that he wasn't apart of the special compensation, he left and came back. He was never approached, but expressed interest. Anthony didn't give him any information. He found out Anthony was recruiting from ~~Sam~~. Also Blaise may have told him. Not sure how he found out exactly. Sept 2015 Bryan said "lets grab dinner," "I know somethings up". Anthony denies there is a plan. Bryan seems to want to join but Anthony doesn't trust him. Bryan later contacts Uber (October). He said he was talking to Uber to have the vehicle team and selling it to Uber. Anthony said if he was talking to Uber he said they should all sit down with Uber together. Anthony was introduced to Uber 2014. When was the first meeting with Uber about new business. October.

Bryan realizes the level of discussion was more advanced than he expected. That evening he meets with his friends he decided to stay for 10m. He was then aware of what was going on but not involved anymore.

Collin (user experience)

Uber

Lior:

They had several conversation, chats, text, meetings with Uber. Anthony had the contacts with Uber. There may be one accidental email to Google account about meeting. (search Lior's email address on Anthony's devices). Maybe snapchat.

How did they begin? How do we build something at Google. It will likely be too complicated to do at Google so we should just leave. Nov or Dec is when they decided to make the move.

How did you see yourself in the company? To build what needs to be built.

Group Meetings,

Laser Team BBQ to celebrate a mile stone. Discussed work stuff. There were a couple of side chats about NewCo and related conversation. Lior was introduced to the group. Nov 2015.

PN 1

Dec 2015. 20 people Pierre, Gaetan, Drew, Liala, Luke, Lior. Bunch of non google people. About everyone is interested, organized by Anthony. no slide deck, just verbal discussion (Lior may have had a pptx but not sure). Lior's presentation was about the truck.

Additional

Claire Delaunay

David Walkerstoffer

Brian Dowdall

Brian T

Brian C

Word of mouth invites

Ski Trip

Early Jan 2016. Everyone from Laser team. Some struggles showed up. Not an official google trip. Team bonding and laser work. Pierre and Gaetan and Anthony chatted about how to build from scratch without using any IP. They could do it without any prior designs or IP.

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Who brought it up? Anthony asked if they could make a laser without using IP. Pierre said they could redo it or infringing on IP. The point of the laser interoperates the "world". Their intention was to do this clean and build it from scratch.

They would rebuy the same parts, but they were not going to remake what Google already made. Lior was not on this trip.

PN2

Drew organized meeting at Anthony's house to discuss an exit from Google. Confirm within the next couple of day Anthony would leave and the rest would follow.

Pierre

Gateon

will

Liala

Brian Dowdall

Claire Delaunay: now work at Otto

David Wakerstoffer: now work at Otto

Ionut: received offer that night (he requested Anthony leave first)

Luke: received offer that night

Sam: received offer that night

Lior

~~Drew may have sent a calendar invite to peoples google accounts. Other non google people there.~~

~~Handed out extra offer letters. Actively encouraging people to leave.~~

The next day (Tuesday), they have a chat with Brian Seleski about his role at Google going forward. They discuss something before the 11 am weekly meeting. Brian was going to announce Anthony was leaving the laser team but staying within Google. 100 % charade.

They go to the actually meeting. They break the news, Brian leaves the room. Anthony then opens up the room for discussion. Anthony mentioned he may be leaving if he cant find something within Google, Alphabet.

Why are you being replaced? They wanted to put a more loyal person in charge of the team.

Anthony announced to the group that he was proud of the team and he was undecided if he was leaving the company.

Larry likes what he does but he doesn't have much say. Chris doesn't like him. Brian likes what he does but he knows he may be leaving.

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Anthony leaves the next day.

Who do you contact. Very very few at Google. He spoke with Chelsea, John kraftcheck, and Sergai.

Sergai didn't want him to leave. He mentions to both that he may start up a new company.

John, what happened? He asked what he was going to do. He tries to find him a position back at Google.

Chelsea and her boss and bosses boss. (Stacey Sullivan).

Social nice conversation.

A number of people reach out about joining Newco. He responds that he cant respond or he doesn't respond. He answers social stuff but not about work. Anthony doesn't talk to anyone at Google. No oral, written, or electronic. Inbound but no outbound.

There are some people who left google on their own.

Claire: they used to date and had many chats about robots. She expressed interest in joining the newco. How many times did you meet about NewCo? 4 times. Started Sept 2015. Software engineer. Talked about the software requirements for a truck. She left Google 2 weeks after Anthony

Met David about Newco 1 before and 1 after group meetings about Newco. He was on a visa that needed to be transferred. 1st meeting at google, 2nd on the street by Anthony's house. Left 2 weeks ago.

Dan Ratner used to work for Google but Anthony didn't talk to him. Dan talked to Lior after he left Google.

How many employees? 30

How many from google? 16 (10 of them were recent).

1st communications with Uber Sept.

Tell us what happened with the ~~DATA~~

DESTRUCTION DISC

There was a meeting to check in about how things are going. Anthony disclosed he went through his stuff that have sensitive Google data.

What was on it? Source code, design files, high value. Engineering docs to create self driving car. (Googles) software required for driving the car.

How did you obtain it? Through the work process.

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How did they get on the hard disk? Nature course of business.

Checked-out code to work on it. As early as December.

Did you create the files on the disk? He got them off the personal mac.

What would it be called? .tc truecrypt file.

Anyone from Google can pull data. Common team password.

They were likely there for many years.

Found them the same time as the "box of stuff".

Who did you tell. Attorney, Lior.

What happens next. Go to Uber, I have some stuff I want to get rid of. Cam Nina and Travis.

Cam says: oh you should not delete that we need to see it and understand what in there. (for preservation purposes"

Travis says: Don't take any advice from Cam. If you have google stuff I don't want know about it, I don't want it here, do what you need to do "

Anthony says: I am going to delete it

Travis: nods

Cam clearly disagrees but does not object (visibly disagrees)

Nina: is amused

What did you do then? He left the meeting with the understanding to delete the data. Took them to a shredder by the airport (Oakland).

How long was the conversation. 3 minutes.

Later that afternoon, Cam called and said "please don't shred them" Anthony said "too late", and then Cam said please don't delete or shred other things.

Cam called back again and said "I want to make sure you don't delete more stuff". (sometime over the weekend). Lior also called and said they told him the same thing, he may have spoken to Nina.

Lior only knew there was confidential data on there.

What did Lior say when he found out you had the data. He was surprised and said that they should tell Uber about it. After the meeting it was clear the consensus was to delete it.

Lior never suggested to delete the data.

Was Cam upset that you destroyed the disks?

They all understood the disks would be deleted.

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Met Travis in 2012 and Garret Kamp, gave them laps in the self driving car. They wanted to buy 20 cars right there but they were not ready.

Late 2014, travis handed him off to Jeff Holden and tried to get him to join Uber.

Later he saw Brian had joined Uber and followup meeting about a separate business. 2 lunches in July or August 2015.

August Sept, Antony by himself, lets seek funding from you guys... started negotiating. (fund raising and purchase of future technology).

They said they didn't want to fund they wanted to be a beta customer.

Talk to TK to decide what to do. Travis doesn't want to just buy stuff they wanted to be more involved, Started out them being a customer.

They go to Uber twice a month since Sept, (Brian, Cam, Nina, Jeff, TK)

They spoke to Travis and said they were thinking of leaving Google in Oct.,

Brian peels off (from Google). And their project kept moving forward.

1 meeting with Brian S and Uber

During meetings at uber, do you discuss the Newco? No specifics, just that there is a New Co

When did they become aware? Second meeting.

Did Uber direct the hires? Not really, no specific names. General conversation about laser technology.

What happens December 2015

They progress further and further, price, tax structure,

Reached agreement December (started negotiating term sheet which was signed in Feb).

There was a plan to acq Otto before he left Google.

The group discussions were sparked by internal issues at Google.

John Bayers (runs Uber self driving car division).

Things are progressing but not as quickly as they hoped.

One other person at Uber Emil who is Cams boss. Only had 3 conversations. Make sure the deal was still on. Wanted to set up a corporate database to get people who worked on robots.

Would you have left Google if Uber wasn't there? Yes.

Who called who in June. Anthony congratulated Brian and Brian said, hey lets get lunch.

There was a later follow up

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June 16th Brian left google to go to Uber.

What do you talk about at lunch? What Brian is doing there. How its going. They leave it as they should follow up. Brian follows up in July or Aug. They meet alone, in person. They talk about ideas ..

When you left the first meeting, did he encourage you? Anthony was not solicited.

2nd lunch 2 or 3 weeks later. He may have emailed about lunch? Anthony expresses unhappiness, they need additional robotic efforts. The don't discuss New Co. they leave the conversation by having a mutual interest.

[REDACTED] B@gmail.com

it would be interesting to have an offer from Uber to buy the Google team. They wanted to know the market value for the chauffeur team. They never followed up on that. They wanted to put a price tag on the team.

Anthony reached out for the 3rd meeting. Uber said they were not going to get a price for the team. They got lunch in SF by Uber office. (with just Brian at Alta Café) they start discussing uber buying lasers from the start up for their cars.

4th meeting Bryan Cam Nina meeting at Uber (Sept or Oct). Discuss customer roll up, they don't intend to invest in a start up. They talk about being a customer,

5th Cam Nina and Lior Anthony (customer deal)

6th Bryan Cam Nina (verbal of what they might do)

Travis comes into the picture October at Uber office (Travis calls or text)

Only emails with Jeff and Bryan. Some texts with Cam. Nina 30 messages TK 200 messages Jeff 20 messages.

Travis is main contact.

All emails were deleted from gmail account. It was weird to have emails from Uber while still at Google.

Oct there is a 1 on 1 with Travis. They meet at Uber on Sunday. They talk high level robot stuff. This is the first long discussion with him, he doesn't know much about robot cars. He wanted to buy or nothing, 8pm to 2am. Bigger deal or smaller deal.

Met with someone at uber the following week. Cam and Bryan. Only Anthony no Lior. At Uber. They get on the same page. Next steps are if they want to do something like this. There are a total of about 20 meetings.

They then start to negotiate specifics. (nov-Dec) meetings now every other week.

Post the meeting with Saleski, the meetings have been regular and include Lior. Cam Nina Travis, John.

Continue meetings twice a month.

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Did they ever ask about confidentiality? Yes,

They discussed with uber multiple times before leaving google (nov dec). they always said they would start from scratch. 3rd party called Velenime that has similar technology. Anthony said he could do it without infringing on any patents.

What sort of research? deliver lasers, help deploy vehicle quickly, help build kit. He expects to have a role to be in charge of the technology.

Not relying on Google technology to do the work for Uber.

Have you discussed with anyone about joining Uber? No, just Lior and Anthony.

Nobody that he knows of at Google know about the Uber deal. Brian may have guarded the secret but he may use it later to help him negotiate later. (all speculation).

John Hankey left, Larry Page, John Kraftcheck,

John Hankey started a game co from Google. Lior and Anthony talked to him about how to spin out trucks. He left within the last 6 months. Asked advice how to handle Google legal, PR, mechanics. Wanted insite on the kit solution. (sept 2015) he doesn't know about Uber.

Are you anticipated duties at uber similar to google. Yes

Will they compete? He will help a division compete with Google, but he will help build trucks and kits which won't compete.

Describe otto: design trucks to eliminate a driver . kits? Sell hardware to install and have the car drive itself. Why pursue it? Its awesome. Great profit potential.

Both jobs involve making something with wheels without a driver.

Otto focuses on self driving trucks which is different from picking up people. The kits are secondary. Google wasn't doing any of this.

Rely on experience at Google, did not rely on information. Relying on understanding.

50 (individuals) skill sets, engineers

Do you have alternatives, yes

Source? Take referrals, recruiting spree from non google, referrals non google, they have recruiter.

What is your role? Meet and interview all non google employees and evaluate. Not the sole person to hire. (has the power to veto)

New hires meet with individually with people, group discussion, offer

Have googlers contacted you about wanting to work at Otto. Yes, there are some more specific but he doesn't respond. They are all saved on his phone. Not taking any calls from Googleres.

How do you determine salary. Look at w2 and match.

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Glassdoor is used as a reference.

Based on skill set, that determines their role at Otto.

Is that different for Google. Totally separate process.

Expects process for Google employees is, interview with non google, they decide, rhian decides salary.

What safeguards are in place. Have them sign a piece of paper stating they are not brining in any data from last employer. Google employees confirm they were not solicited.

All code has to be written and checked in.

Any training? No

Policy? Yes, don't bring personal computers. Don't take any tools home.

Any 3rd party vendors? Yes, they contact same vendors to make machine parts (not the same parts). They also purchase equipment (tooling for culrcut boards). They will contact same vendors.

Made a list from trade shows.

Agreements? Yes

Anything to add? Probably not

Anything you want to check? Sure but nothing right now

Have you provided everything? Yes

True and correct? Yes

Did you announce your departure? No

No press release? No

How do you think your departure will effect google? They will get press inquiries, slow them down.

Any other communications with these individuals you spoke to about your new co or leaving google.

Anthony is checking them off the list mary provided him.

Google side with Clay Bavor

Cardboard

Mega presence or Tela presence

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Clay still has some of his equipment. A robot arm.

Non google side projects with clay

Future game (stock market predictor)

Prototype this

Anthony's robots

S10 Systems

Darpa grand challenge into Laraison which turned into S10 (gps bulldozers)

Glimmer (3 second video sharing). Non google related. Dead start up

Date Knight (non google side project)

Nemo (non google) modular building manufacturing company.

East Bay Portfolio (real estate development)

Brian Dowdall

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